

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**MULTIPLAYER NETWORK  
INNOVATIONS, LLC,**

*Plaintiff,*

v.

**AMAZON.COM, INC.,**

*Defendant.*

**MULTIPLAYER NETWORK  
INNOVATIONS, LLC,**

*Plaintiff,*

v.

**HTC CORPORATION and HTC AMERICA,  
INC.,**

*Defendant.*

**Case No. 2:14-CV-825-JRG-RSP  
LEAD CASE**

**JURY TRIAL DEMANDED**

**Case No. 2:14-CV-833-JRG-RSP**

**JURY TRIAL DEMANDED**

**PLAINTIFF MULTIPLAYER NETWORK INNOVATIONS, LLC'S  
ANSWER TO DEFENDANTS HTC CORPORATION AND HTC AMERICA, INC.'S  
COUNTERCLAIMS**

Plaintiff Multiplayer Network Innovations, LLC ("MNI"), by and through its undersigned attorneys, answers the counterclaims of Defendants HTC Corporation and HTC America, Inc. (collectively, "HTC" or "Defendants") by corresponding paragraph number as follows:

1. MNI admits that HTC seeks declaratory judgments of non-infringement, and invalidity of U.S. Patent No. 5,618,045; however, MNI denies that HTC is entitled to any such relief.
2. Paragraph 2 of HTC's counterclaims do not contain allegations which require a response from MNI.

**PARTIES**

3. Admitted.
4. Admitted.

**PATENT-IN-SUIT**

5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.

**COUNT I**

(Declaration of Non-Infringement of the '045 Patent)

11. MNI incorporates its responses to paragraphs 1-10 of HTC's counterclaims as if fully set forth herein.

12. Admitted.
13. Denied.
14. Admitted.
15. Denied.

**COUNT II**

(Declaration of Invalidity of the '045 Patent)

16. MNI incorporates its responses to paragraphs 1-15 of HTC's counterclaims as if fully set forth herein.

17. Admitted.
18. Admitted.
19. Denied.
20. Denied.

**DEMAND FOR JURY TRIAL**

MNI demands a trial by jury on all issues so triable.

**PRAYER FOR RELIEF**

WHEREFORE, MNI prays that this Court will:

- A. Dismiss HTC's counterclaims against MNI with prejudice;
- B. Hold that HTC is not entitled to any relief, whether in law, equity, or otherwise, on its counterclaims against MNI;
- C. Declare that HTC has infringed and does infringe one or more claims of the '045 Patent;
- D. Declare that the claims of the '045 Patent are valid and enforceable;
- E. Award MNI any other relief, in law and in equity, to which the Court finds MNI is justly entitled.

Dated: October 28, 2014

Respectfully submitted,

/s/ Elizabeth L. DeRieux  
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*Attorneys for Plaintiff,  
Multiplayer Network Innovations, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 28th day of October, 2014, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

/s/ Elizabeth L. DeRieux  
Elizabeth L. DeRieux